

CONSULTATION QUESTIONS

General questions

Question 1: Do you consider that the overall number of seal haul out sites proposed at national/regional/local level represent a reasonable balance between seal conservation and other sustainable activities around the Scottish coastline?

MeyGen Ltd is the development company and project sponsor which secured an Agreement for Lease from The Crown Estate for Inner Sound between the island of Stroma and the north coast of the Scottish mainland. It is our overall goal to deliver a fully operational, 398MW tidal energy project.

The number of haul out sites proposed in the consultation will have a significant impact on the Scottish Government's ability to reach its target of 100% electricity generated from renewable sources by 2020. These are in turn related to UK and EU targets on renewable energy and climate change.

In the North Scotland and Orkney Management Area this will also have a significant impact on the Scottish Government target of producing 1.2GW of electricity from wave and tidal energy projects. This is discussed further in Question 3.

Question 2: Do you consider that additional sites should be included at national/regional/local level and, if so, why, how many additional sites and which sites?

N/A

Question 3: Do you consider that fewer sites should be included at national/regional/local level and, if so, why, how many fewer sites and which sites?

The number of haul-out sites proposed in the consultation will have a significant impact on the Scottish Government's ability to reach its target of 100% electricity generated from renewable sources by 2020. In the North Scotland and Orkney Management Area this will also have a significant impact on the Scottish Government target of producing 1.2GW of electricity from wave and tidal energy projects.

Specifically for the Inner Sound area, where the MeyGen project is located.

The proposed seal haul-out areas would have a significant detrimental effect on the ability of the project to connect to the electricity grid infrastructure onshore. Due to the novel technology and unique physical environments that tidal stream energy projects are situated, the requirements for cable landing on to shore are very specific. In the Inner Sound there are currently only a few options to bring cables to shore and connect to the national grid. The proposed haul-out sites at Ness of Quoys (53, Harbour seals) and Gills Bay (129, Grey seals) are two such locations. MeyGen Ltd would strongly recommend that these sites are not designated as they would have a significant detrimental impact on the ability of the project to recognise its potential and therefore the Scottish Government's ability to reach its target of 1.2GW of electricity generated from wave and tidal projects.

MeyGen Ltd would like to know why Stroma island has been included in the Orkney Management Area and not in the North Scotland Management Area? Stroma is significantly closer to mainland Scotland and it is common knowledge that seals regularly move large distances around the area therefore making it difficult to distinguish between separate populations. Given this it seems nonsensical to impose a boundary line such as presented within the consultation, The inclusion of Stroma in the North Scotland Management Area could have a significant impact on population numbers for the area and therefore on the significance of proposed haul-out sites. MeyGen Ltd proposes that Stroma should be included in the North Scotland Management Area and the data re-analysed.

It is very difficult to get a good understanding of the level of haul-out use based on the figures given in the consultation; the resolution is such that it is difficult to interpret. In the Gills Bay area it is unclear about the numbers associated with haul-out sites on the mainland and on Stroma, especially with regard to Harbour Seals. We believe that it would have been far more beneficial to include data in tables to improve the understanding of the site.

MeyGen Ltd would like to understand the level of protection that will be given to these haul-out sites. Is there a definition of harassment available? How will this be decided, and how will activities be licenced/monitored?

Question 4: Do you agree that existing Special Areas of Conservation for seals should be added to the list of seal haul out sites being considered for possible designation?

Question 5: Do you consider that particular national or regional level activities might represent a potential risk of harassment to seals on haul out sites in general?

The MeyGen project has been carrying out data collection on seal activity over the past 20 months in accordance with SNH guidance. At this juncture, we do not believe our tidal energy project will have a significant effect on seal species.

Question 6: Do you consider that particular local activities might represent a potential risk of harassment to seals on particular haul out sites included on the list?

N/A

Question 7: Do you have any views on whether the boundaries of particular haul out sites included on the list might be revised?

To MeyGen Ltd's knowledge the whole of the North Scotland coast is used for haul-outs. From the little data available in the consultation it would seem that there is little difference in populations using these areas. If it were possible, the North Scotland proposed sites 53 and 129 could be moved so not to conflict with the needs of the renewable energy industry.

Equality assessment

The Scottish Government must ensure that any policies that it implements do not unduly discriminate against persons defined by age, gender, disability, sexual orientation, race and religion and belief. We would welcome your views on whether you believe that any of the propositions set out in this consultation paper will unduly impact on any of these groups mentioned.

N/A